

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Benjamin George,

Plaintiff,

v.

City of Chicago, et al,

Defendants.

Case No.: 20 CV 6911

Hon. Judge: Robert Blakey

Mag. Judge: Beth W. Jantz

JOINT MOTION TO EXTEND DISCOVERY FOR LIMITED PURPOSE

The parties, by and through their undersigned counsel, respectfully move this Court to enter an Order extending fact discovery until June 16, 2023, and in support of this Motion state as follows:

1. On April 13, 2023, the Court entered an order setting the close of fact discovery on May 19, 2023. Dkt. 115.
2. At present, fact discovery is nearing completion, but the parties agree that more time is necessary to conduct two depositions.
3. All parties have been deposed or noticed for deposition with the exception of Defendant Sikanich. Defendant Sikanich's deposition has been delayed for multiple reasons.
4. Defendant Sikanich provided supplemental interrogatory and request for production answers on April 28, 2023 and May 1, 2023. This delayed the discovery schedule previously agreed by the parties, as Defendant Sikanich was previously ordered by the Court to provide this information first by March 17, 2023 [Dkt. 104]; then by March 29, 2023 [Dkt. 111]. Additionally, immediately after providing discovery answers,

Defendant Sikanich had a medical issue that rendered his availability the first two weeks of May uncertain. Counsel for the parties had previously scheduled depositions and commitments, including in this case, the following week, meaning his deposition cannot proceed until after the current fact deadline.

5. The parties are deposing multiple treating medical professionals in this matter. One treater, Plaintiff's therapist and counselor Todd Warren, has not yet responded to multiple requests to confirm deposition availability prior to the fact deadline. The parties agree that Mr. Warren's testimony will help facilitate the progression and potential resolution of the case.
6. Accordingly, the parties request that the fact discovery deadline be extended by 28 days, to June 16, 2023, to allow for these depositions to take place.
7. This Motion is brought in good faith, is not intended to cause undue delay, and no prejudice will result to the parties by its being granted.

WHEREFORE, the parties respectfully request that this Court enter an Order granting the instant Motion and resetting the close of fact discovery to June 16, 2023.

Respectfully submitted,

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One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Daniel Massoglia, an attorney, hereby certify that a copy of this document was filed using the CM/ECF system on May 8, 2023, which generates electronic notice to all counsel of record on this case.

Respectfully Submitted,

Daniel E. Massoglia

One of Plaintiff's Attorneys